

VIA ECF

September 5, 2023

The Honorable Ona T. Wang
United States District for the
Southern District of New York
Daniel Patrick Moynihan Courthouse
500 Pearl Street
New York, New York 10007-1312

Re: *JPMorgan Chase Bank, National Association, London Branch v. Tesla, Inc.*,
No. 1:21-cv-09441-PGG-OTW (S.D.N.Y.)

Dear Judge Wang:

Plaintiff JPMorgan Chase Bank, National Association, London Branch (“JPMorgan”) and Defendant Tesla, Inc. (“Tesla”), by and through their respective undersigned counsel, write pursuant to the Court’s July 19, 2023 Order (ECF No. 96) to propose the following jointly composed agenda for the September 7, 2023 status conference:

- I. Tesla’s request for a pre-motion conference on its proposed motion to compel the production of JPMorgan’s October 2018 emails. (ECF No. 105).
- II. Scheduling considerations in light of the parties’ agreements on further document productions.

The parties have filed status update letters filed on August 24 and September 1, 2023 summarizing the parties’ continuing discussions on other issues and have met and conferred by telephone on September 5, 2023.

Respectfully submitted,

By: /s/ Frances E. Bivens
Frances E. Bivens
Davis Polk & Wardwell LLP
450 Lexington Avenue
New York, New York 10017
Tel: (212) 450-4000
frances.bivens@davispolk.com

*Attorneys for Plaintiff JPMorgan
Chase Bank, N.A., London Branch*

By: /s/ Jonathan E. Pickhardt
Jonathan E. Pickhardt
Quinn Emmanuel Urquhart & Sullivan
51 Madison Avenue, 22nd Fl.
New York, New York 10010
Tel: (212) 849-7000
jonpickhardt@quinnemanuel.com

Attorneys for Defendant Tesla, Inc.